

Amendments to the FIGURES:

Replacement Sheets 1-6 are included herein in the appendix. The replacement sheets formalize the reference numbers of the sheets in that many of the originals were hand written. Also, FIGURE 8 was hand written. New FIGURE 8 has been formalized. No new matter has been added.

REMARKS/ARGUMENTS

Claims 1-6 and 18-20 remain in this application for further review. Claims 7-17 are cancelled. New claims 21-31 are added. No new matter has been submitted.

I. Examiner Interview Dated January 8, 2006

An Examiner Interview was held on January 8, 2006. During that interview, the claims of the current application and the claims of the allowed parent application were discussed. An agreement as to allowability was not reached. However, applicants believe that the claim changes herein clarify and push the claims over the cited references.

II. Objections to the Title

The title has been objected to because it is not descriptive. Applicants propose the Title as set forth above. Applications respectfully request reconsideration.

III. Objections to the Claims

Claims 1, 3-6 and 18-20 are objected to for include the language "for each", "for facilitation", "for the resources", "such that", and "if". The claims have been amended as set forth above to overcome the objections. Applications respectfully request reconsideration.

IV. Rejections under 35 U.S.C. 101

Claims 1 and 18 are rejected under 35 U.S.C. 101 because there is no alternative to the "if" statement. Claims 1 and 18 have been amended as set forth above to include "when" statements that applicants believe are concrete.

Claim 18 is further rejected under 35 U.S.C. 101 because the claim could cover a "carrier wave." Claim 18 has been amended to recite "computer-readable storage medium." Applicants assert that the claim is now statutory.

Claims 1 and 18 are further rejected under 35 U.S.C. 101 because the claims are not tied to anything concrete. Claim 18 has been amended to recite a "computer-readable storage medium." Claim 1 recites a "computer-implemented method." Applicants assert that the claims

are statutory and if further contentions are forthcoming, applicants respectfully request a showing of evidence that such preambles have been held as non-statutory under 35 U.S.C. 101.

V. Rejections Under 35 U.S.C. 112, Second Paragraph

Claims 1 and 18 are rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicants regard as the invention. The claims have been amended as set forth above. Applicants respectfully request reconsideration.

VI. Rejection Under 35 U.S.C. 102(a) and 102(e)

Claims 1-6 and 18-20 are rejected under 35 U.S.C. 102(a) as being anticipated by Windows 2000 Resource Kit, "How FRS Works" File Replication Service. Pg. 1-4, August 31, 2000 (hereinafter "Windows"). Claims 1-6, and 18-20 are rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,256,634 issued to Moshaiov et al. (hereinafter "Moshaiov"). Applicants respectfully disagree with the rejections. Independent claim 1 has been amended to clarify the following combination of features that is not taught or otherwise suggested by the cited references:

creating a manifest file at the first member, the manifest file including an identifier of each of a plurality of resources of an application that exists at the first member;

causing the manifest file to be reproduced at the second member;

in response to the manifest file being reproduced at the second member, *identifying whether each resource identified in the manifest file exists at the second member*;

when each resource identified in the manifest file does not exist at the second member, *preventing the application identified in the manifest file from being executed until each resource exists at the second member*; and

when each resource identified in the manifest file does exist at the second member, executing the application identified in the manifest file.

Applicants assert that the cited references do not teach or otherwise suggest the above features. Windows teaches general operations association with the functionality of FRS. Applicants can find no teaching of a manifest file that is created on a first member and reproduced at a second member. Applicants also cannot find any teaching of comparing the manifest file to a second member. There is no teaching that "when each resource identified in the manifest file does not exist at the second member, preventing the application identified in the manifest file from being executed until each resource exists at the second member." Also, there is no teaching that "when each resource identified in the manifest file does exist at the second member, executing the application identified in the manifest file." Windows teaches FRS operation at steps 1-10 on pages 2 and 3. The above features are not taught and applicants respectfully request clarification.

Regarding Moshaiov, Moshaiov teaches a method for purging tombstones for deleted data items in a replicated database. Moshaiov teaches a deleting table. *Moshaiov*, at col. 10, line 56-57. The Abstract of Moshaiov does not indicate that the deletion table is reproduced on the second member. Col. 5, lines 42-54 of Mashaiov indicates that data is replicated on the servers. Applicants can find no teaching that "in response to the manifest file being reproduced at the second member, identifying whether each resource identified in the manifest file exists at the second member." There is no teaching that "when each resource identified in the manifest file does not exist at the second member, preventing the application identified in the manifest file from being executed until each resource exists at the second member." Also, there is no teaching that "when each resource identified in the manifest file does exist at the second member, executing the application identified in the manifest file." Moshaiov teaches an update queue for the replication servers. The above features are not taught and applicants respectfully request allowance of independent claim 1. Independent claim 18 has been amended to clarify the following combination of features that is not taught or otherwise suggested by the cited references:

receiving a notice that a resource in a group of resources is being modified, the group of resources being interrelated, wherein a proper functioning of the group of resources is dependent on a similar version of each resource in the group of resources coexisting;

in response to the notice, issuing an instruction to create a manifest file;
adding, to the manifest file, an identifier for each resource in the group of resources;
replicating the manifest file on a replication partner;
comparing the replicated manifest file to resources of the replication partner;
delaying execution of the group of resources when the replicated manifest file does not match the resources of the replication partner; and
executing the group of resources when the replicated manifest file matches the resources of the replication partner.

Applicants assert that the cited references do not teach or otherwise suggest the above features. Windows teaches general operations association with the functionality of FRS. Applicants can find no teaching of replicating the manifest file on a replication partner and comparing the replicated manifest file to resource of the replication partner. There is no teaching of "delaying execution of the group of resources when the replicated manifest file does not match the resources of the replication partner." Also, there is no teaching of "executing the group of resources when the replicated manifest file matches the resources of the replication partner." Windows teaches FRS operation at steps 1-10 on pages 2 and 3. The above features are not taught and applicants respectfully request clarification.

Regarding Moshaiov, Moshaiov teaches a method for purging tombstones for deleted data items in a replicated database. Moshaiov teaches a deleting table. *Moshaiov*, at col. 10, line 56-57. The Abstract of Moshaiov does not indicate that the deletion table is reproduced on the second member. Col. 5, lines 42-54 of Mashaiov indicates that data is replicated on the servers. Moshaiov teaches an update queue for the replication servers. The above features are not taught and applicants respectfully request allowance of the independent claim 18.

Claims 2-6 and 19-20 include features not taught or otherwise suggested by the cited references. Moreover, those claims ultimately depend from independent claims 1 and 18, respectively. As such, they are thought allowable for at least those same reasons.

VII New Claims 21-31

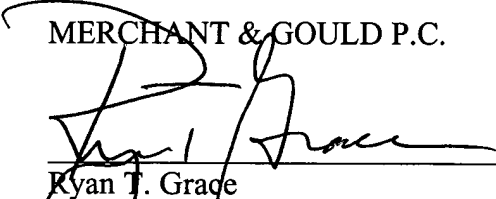
New claims 21-31 are added as set forth above. Applicants cannot find any teaching of the features of claims 21-31 in the cited references. The claims do not include new matter. Applicants respectfully request consideration of new claims 21-31.

VIII. Request for Reconsideration

In view of the foregoing amendments and remarks, all pending claims are believed to be allowable and the application is in condition for allowance. Therefore, a Notice of Allowance is respectfully requested. Should the Examiner have any further issues regarding this application, the Examiner is requested to contact the undersigned attorney for the applicant at the telephone number provided below.

Respectfully submitted,

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